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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

ALLIANCE INDUSTRIAL GROUP,)	CASE No. 15-736
INC., an Oregon corporation,)	
)	NOTICE OF REMOVAL OF CIVIL ACTION
Plaintiff,)	BY DEFENDANTS TURNER
)	CONSTRUCTION COMPANY LIBERTY
v.)	MUTUAL INSURANCE COMPANY
)	
TURNER CONSTRUCTION)	
COMPANY, a New York corporation;)	
and LIBERTY MUTUAL INSURANCE)	
COMPANY, a Massachusetts)	
corporation,)	
)	
Defendants.)	

TO: The Judges and the Clerk of the United States District Court for the District of
Oregon

PLEASE TAKE NOTICE that Defendants TURNER CONSTRUCTION COMPANY, a
New York corporation; and LIBERTY MUTUAL INSURANCE COMPANY, a Massachusetts

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DEFENDANTS TURNER CONSTRUCTION COMPANY LIBERTY
MUTUAL INSURANCE COMPANY

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corporation, pursuant to 28 USC §§ 1332, 1441, and 1446, hereby file their Notice of Removal of the action styled *Alliance Industrial Group, an Oregon corporation, Plaintiff v. Turner Construction Company, a New York corporation and Liberty Mutual Insurance Company, a Massachusetts corporation, defendants*, pending in Washington County Circuit Court as Case Number C 15 1370 CV, from the Washington County Circuit Court, Oregon, to the United States District Court for the District of Oregon. The grounds for removal are as follows:

1. On March 27, 2015, the foregoing action was filed in Washington County Circuit Court, against the parties above mentioned. The action seeks money damages in excess of \$75,000.
2. Plaintiff is an Oregon corporation.
3. Defendant Turner Construction Company is a New York corporation with its principal place of business in the State of New York and not in the State of Oregon. Defendant Turner Construction Company was served with summons and complaint on April 1, 2015.
4. Defendant Liberty Mutual Insurance Company is a Massachusetts corporation with its principal place of business in the State of Massachusetts and not in the State of Oregon. Defendant Liberty Mutual Insurance Company was served with summons and complaint on April 1, 2015.
5. The action first became fully diverse and subject to removal on April 1, 2015.
6. A copy of the Complaint and the Summons are attached hereto as Exhibit A.
7. No defendant has appeared by filing an appearance of any kind in the Washington County Circuit Court.
8. Pursuant to 28 USC § 1446(b), this Notice of Removal is timely filed within thirty (30) days of the action first becoming removable.

9. This action maybe removed to this court pursuant to 28 USC § 1441(b) because this court has original jurisdiction over this action pursuant to 28 USC § 1332(a). The matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs, and Plaintiff and the Defendants are citizens of different states, in that Plaintiff is an Oregon corporation, with its principal place of business in Oregon, defendant Turner Construction Company is a New York corporation with its principal place of business in New York; defendant Liberty Mutual Insurance Company is a Massachusetts corporation with its principal place of business in Massachusetts.
10. The United States District Court for the District of Oregon (Portland Division) is the "district and division" for actions removed from the circuit court of Washington County, Oregon, as provided by 28 USC §§ 117; 1446(a) and LR 3.2(a)(1).
11. Pursuant to 28 USC § 1446(d) a copy of this Notice of Removal is being filed with the circuit court of the State of Oregon; County of Washington.
12. Pursuant to 28 USC § 1446(d), removing defendants are providing written notice to Plaintiff of the removal.

WHEREFORE, Defendants TURNER CONSTRUCTION COMPANY and LIBERTY MUTUAL INSURANCE COMPANY hereby remove the action now pending against them in the circuit court of the State of Oregon, County of Washington, to this Honorable Court, and request that this Court retain jurisdiction for all further proceedings.

DATED this 30th day of April, 2015.

CANN LAWYERS, A PROFESSIONAL CORPORATION

____/s/ FREDERIC CANN_____

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